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**UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION**

Trong Nguyen, Inc. on behalf of itself and)
 and all others similarly situated,)
)
 Plaintiff,)
 v.)
)
 Samsung Electronics Co., Ltd., et al.,)
)
)
 Defendants.)

Case No. C-07-0086-SBA

**DECLARATION OF HARRY
 SHULMAN IN SUPPORT OF
 PLAINTIFF'S ADMINISTRATIVE
 MOTION TO CONSIDER
 WHETHER CASES SHOULD
 BE RELATED**

THIS DOCUMENT RELATES TO:)
 Case No. C-07-4944-BZ)
)
 WESTELL TECHNOLOGIES, INC., on)
 behalf of itself and all others similarly)
 situated,)
 Plaintiff,)
 v.)

The Honorable Sandra B. Armstrong

Samsung Electronics Co., Ltd., et al.,)
)
 Defendants.)

I, Harry Shulman, declare as follows:

1. I am an attorney with The Mills Law Firm. I am admitted to practice before the bar of this Court and many other federal courts, as well as all state courts in California and Colorado. I am counsel for Plaintiff Westell Technologies, Inc. in *Westell Technologies, Inc. v. Samsung Electronics Co., Ltd., et al.*, Case No. C-07-4944-BZ. I submit this Declaration in support of Plaintiff Westell Technologies, Inc.'s Administrative Motion to Consider Whether Cases Should be Related.

2. On January 5, 2007, Plaintiff Trong Nguyen filed a Complaint in the Northern District of California alleging a conspiracy to fix prices of Flash Memory products, styled *Nguyen v. Samsung Electronics Co., Ltd., et al.*, Case No. C-07-0086-SBA ("*Nguyen*"). Nguyen filed an amended complaint on January 18, 2007. Nguyen alleged violations of federal antitrust laws, as well as violations of state common law, antitrust, unfair competition, and consumer protections laws. Nguyen's complaint is the earliest filed complaint in the Northern District of California alleging that Defendants fixed the prices of Flash Memory products.

3. In Orders dated March 14, April 27, May 14, June 12, August 2, August 13 and August 21, 2007, the Court related the following actions to *Nguyen*:

- i. *A Computer Place, Inc. and Timothy Chanda v. Samsung Electronics Co., Ltd., et al.*, Case No. C-07-1020-WHA.
- ii. *Miller v. Samsung Electronics Co., Ltd., et al.*, Case No. C-07-1147 EDL.
- iii. *Burke v. Samsung Electronics Co., Ltd., et al.*, Case No. C-07-1236 MJJ.
- iv. *Perkins v. Samsung Electronics Co. Ltd., et al.*, Case No. C-07-1360-JL.
- v. *Burt v. Samsung Electronics Co., Ltd., et al.*, Case No. C-07-1388-MMC.
- vi. *TechToysForLess v. Samsung Electronics Co., Ltd., et al.*, Case No. C-07-1418-SC.

- vii. *Huh v. Samsung Electronics Co., Ltd., et al.*, Case No. C-07-1459-JCS.
- viii. *Krahmer v. Samsung Electronics Co., Ltd., et al.*, Case No. C-07-1460-SC.
- ix. *Alderman v. Samsung Electronics Co., Ltd., et al.*, Case No. C-07-01489 SBA.
- x. *Greenwell v. Samsung Electronics Co., Ltd., et al.*, Case No. C-07-01524 SBA.
- xi. *Sweatman v. Samsung Electronics Co., Ltd., et al.*, Case No. C-07-01613 SBA.
- xii. *Pellitteri v. Samsung Electronics Co., Ltd., et al.*, C-07-01614 SBA.
- xiii. *Kevin's Computer and Photo v. Samsung Electronics Co., Ltd., et al.*, C-07-01665 SBA.
- xiv. *Theisen v. Hitachi, Ltd., et al.*, Case No. C-07-01680 SBA.
- xv. *Davis v. Samsung Electronic Co., Ltd., et al.*, Case No. C-07-01735 SBA.
- xvi. *McClellan-Chambers et al. v. Samsung Electronics Co., Ltd., et al.*, Case No. C-07-01823 SBA.
- xvii. *Juskiewicz v. Samsung Electronics Co Ltd., et al.*, Case No. C-07-01829 SBA.
- xviii. *Rippel v. Samsung Electronics Co. Ltd., et al.*, Case No. C-07-02066 SC.
- xix. *Young v. Samsung Electronics Co., Ltd., et al.*, Case No. C-07-02286 MMC.
- xx. *Harrison v. Samsung Electronics Co., Ltd., et al.*, Case No. C-07-03971 VRW.
- xxi. *Skorstad v. Samsung Electronics Co Ltd., et al.*, Case No. C-07-02228 MEJ.
- xxii. *Calif-Coast Investigative Services v. Lexar Media, Inc., et al.*, Case No. C-07-03775 EDL.
- xxiii. *Cravens v. Lexar Media, Inc., et al.*, Case No. C-07-04082 MJJ.

4. Westell Technologies, Inc. has not appeared in any of the above-listed related actions currently pending in the Northern District of California. Civil Local Rule 3-12 requires that an Administrative Motion to Consider Whether Cases Should be Related be promptly filed. Accordingly, and as the Defendants are in the process of being served, a stipulation could not be obtained prior to filing Plaintiff's Administrative Motion.

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1 I declare under penalty of perjury under the laws of the United States that the
2 foregoing is true and correct. Executed this 26th day of September, 2007 at San Rafael,
3 California.

4
5 /s/ Harry Shulman
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